



November 23, 2021

Mr. Chris Hare
EGLE Air Quality Division
Bay City District
401 Ketchum Street, Suite B
Bay City, MI 48708-5430

Dear Mr. Hare:

In response to the Violation Notice received from your office on Wednesday, Nov. 10th, 2021, the following written response is provided.

A call was placed on 10/27/2021 to EGLE Environmental Analysts Gina McCann & Nathanael Gentle to advise HSC had exceeded the 30 day rolling NOx limit of 0.037 lb/MMBtu, per S.C.I.1. of MI-ROP-B2644-2021, on 18 operating days during third quarter 2021. The exceedances occurred due to the boiler operating at low loads; and intermittently during the reporting period. The 30 day rolling NOx limit was exceeded between 8/17 and 9/3 when the boiler was only operated for up to 0.5 hours two times per day, in order to keep the boiler in standby mode.

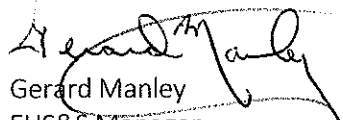
In order to prevent a violation from reoccurring, HSC Boiler Operators will not continue to warm Boiler 10 intermittently when in standby mode. We anticipate this will prevent a reoccurrence of an exceedance of the 30 day rolling NOx limit .

The 0.037lb/MMBtu permit limit was exceeded due to the extremely low amount of btus generated during this low-load period. As such, at no time did HSC exceed its hourly limit of 5.6 pph NOx. The highest hourly NOX rate was only 3.3 lb/hr during the reporting period. HSC also did not exceed the NSPS limit of 0.2 lb/MMBtu.

When HSC accepted the permit limits, we did not expect the boiler to operate in this low load capacity for an extended period of time. Since this operating condition may be desirable during the summer months, HSC will apply for a Permit To Install modification to increase the 30 day rolling NOx lb/MMBtu limit to the NSPS limit. As demonstrated under this low load condition, HSC will maintain the hourly NOx limit, which is protective of ambient air quality standards.

If you have any questions or require additional information, please contact me at 989-436-1835.

Sincerely,



Gerard Manley
EHS&S Manager

Attachments

Copy: Gina McCann, Senior Environmental Quality Analyst-EGLE (By email only)
Nathanael Gentle, Environmental Quality Analyst-EGLE (By email only)
Stephanie A. Jarrett, PE – Fishbeck (By email only)
Jeff Schrems, Environmental Professional-HSC (By email only)